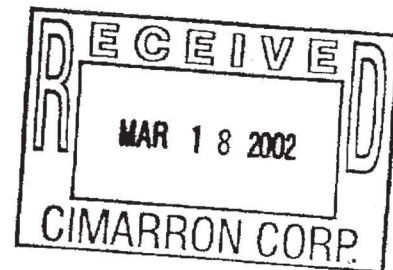




UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

March 12, 2002



Mr. Jeff Lux, Manager
Planning and Regulatory Compliance
Cimarron Corporation
P.O. Box 315
Crescent, OK 73028

SUBJECT: ISSUES REGARDING SUBAREAS G AND K, AND REQUEST FOR A SCHEDULE
FOR THE REMAINDER OF DECOMMISSIONING ACTIVITIES

Dear Mr. Lux:

As discussed in our telephone conference on January 16, 2002, the U.S. Nuclear Regulatory Commission (NRC) staff has identified regulatory issues concerning the release of Subareas G and K, related to the occurrence of technetium-99 (Tc-99) in Subarea G, and a need for an approved decommissioning schedule in your license. In response, NRC staff has decided to amend the Cimarron license to release Subarea K, pending submittal of an acceptable decommissioning schedule, but withhold release of Subarea G until Cimarron addresses the onsite Tc-99 contamination.

We will release Subarea K after Cimarron submits a schedule for the remainder of your decommissioning activities. Upon receipt of your decommissioning schedule, we plan to include it in your license amendment releasing Subarea K and tie the schedule down within your license. We request that you submit this schedule no later than April 17, 2002.

With respect to the Tc-99 contamination in Subarea G and other locations, such as Waste Pond 1, Waste Pond 2, and Burial Area 1, we request that you characterize the potential presence of Tc-99 in the groundwater at these locations, as well as the pathway of discharge to the Cimarron River. If you suspect Tc-99 to be in other areas onsite, then you should characterize the groundwater in these other areas too. In addition to characterization, you

Mr. J. Lux

2

should propose action limits for increased monitoring or remedial action and describe your plans for monitoring groundwater for Tc-99 and remediation (if needed). We request that you submit this information to us no later than October 31, 2002.

If you have any questions regarding this letter, please contact me at (301) 415-6664 or by e-mail at KLK@NRC.GOV.

Sincerely,



Ken Kalman, Environmental Scientist
Decommissioning Branch
Division of Waste Management
Office of Nuclear Material Safety
and Safeguards

Docket No. 70-925
License No. SNM-928

cc: Cimarron Distribution List



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

Safety & Environmental
Affairs Division

OCT 18 2000

Remediation Department

October 13, 2000

42A

Mr. Jess Larsen, Vice President
Cimarron Corporation
P.O. Box 25861
Oklahoma City, OK 73125

SUBJECT: FINAL STATUS SURVEY REPORT FOR PHASE II, SUBAREA G

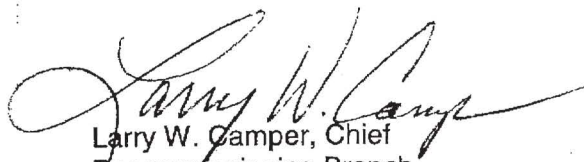
Dear Mr. Larsen:

The U.S. Nuclear Regulatory Commission (NRC) staff has reviewed Cimarron's "Final Status Survey Report for Phase II Subarea G" dated October 21, 1999.

There appears to be an error in the first full paragraph of page 8. This paragraph describes concrete rubble as being located in a drainage way at the 820E-694N location. However, there is no drainage way indicated on the map at this location. Please provide the correct coordinates in an amendment to your report.

If you have any questions regarding this letter, please contact Ken Kalman at (301) 415-6664.

Sincerely,


Larry W. Camper, Chief
Decommissioning Branch
Division of Waste Management
Office of Nuclear Material Safety
and Safeguards

Docket No. 70-925
License No. SNM-928

cc: Cimarron distribution list

CIMARRON CORPORATION

P.O. BOX 25861 • OKLAHOMA CITY, OKLAHOMA 73125

S. JESS LARSEN
VICE PRESIDENT

October 26, 2000

Mr. Ken Kalman, Project Manager
Facilities Decommissioning Section
Low-Level Waste & Decommissioning Projects Branch
Division of Waste Management
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington D.C. 20555-0001

**Re: U.S. Nuclear Regulatory Commission (NRC) Letter Dated October 13, 2000 on
Cimarron Corporation's Final Status Survey Report for Phase II, Subarea G**

Dear Mr. Kalman:

The purpose of the letter is to respond to the subject letter from the NRC pertaining to Cimarron's October 21, 1999 Subarea G Final Status Survey Report. The one question is re-printed, followed by Cimarron's comment.

NRC Question:

There appears to be an error in the first full paragraph on page 8. This paragraph describes concrete rubble as being located in a drainage way at the 820E-694N location. However, there is no drainage way indicated on the map at this location. Please provide the correct coordinates in an amendment to your report.

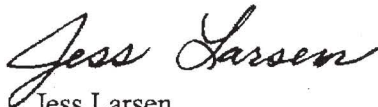
Cimarron's Response:

The location for the referenced concrete is correct. However, this paragraph is misleading in that two areas of concrete are located in the drainage from Reservoir #3. By referring to Drawing 99 POSGCDSS-0 included in Appendix III A.3. under "Drawings", you will see a blue line drainage way just to the west of the main drainage from Reservoir #3. This drainage discharges into the main drainage at approximately 850E-690N. The referenced concrete in question is located on the northern slope of this drainage way at 820E-694N. Additionally, this concrete, along with the main drainage concrete, are shown on Drawing No. 99 POSGCONC-0 included in Appendix III C.3. under "Drawings". Drawing 99POSGCONC-0 shows illustrations for both concrete locations, the one on the left is the concrete in question.

To clarify the fact that two areas of concrete are addressed, the second paragraph on page 8 of the FSSR has been revised. The revised page is included with this letter for replacement in your copy of the Subarea G Final Status Survey Report..

After review of Cimarron's response, if you have any further questions, please contact me.

Sincerely,

A handwritten signature in cursive script that reads "Jess Larsen".

Jess Larsen
Vice President

Attachment

jl102600.le1

second drainage flows north from Reservoir #3 through the adjoining cliffs and bluffs to the floodplain and then combines with the first drainage to flow north toward the Cimarron River. These drainages were included in the 1979 site-wide random micro-R survey discussed in the Characterization Report⁵. The limited micro-R survey results collected from the vicinity of the survey unit were representative of background. The first drainage was included as an affected area because of its potential to receive run-off from the operating facility.

Two areas of concrete are located in the drainage from Reservoir #3. The larger area includes concrete placed along the main drainage from the Reservoir. The second area includes a small amount of the concrete, approximately 196 m³, placed just to the west of the main drainage. Both areas of concrete are within the second Subarea G drainage area. These two areas include concrete, which was surveyed for gross alpha surface activity and shown to meet the applicable criteria for free release prior to being placed within the drainage area. However, since this concrete was removed from an affected area and not beta/gamma surveyed, the concrete and the drainages down stream from the two concrete locations were surveyed as an affected area for this FSS. The affected area final status survey data for these drainages and concrete areas are addressed in Section 5.2.2.

3.3.3 Unaffected Open Land Areas

With the removal of the areas discussed previously in Section 3.3.1 and 3.3.2 all remaining areas within Subarea G were classified as unaffected and surveyed accordingly. Cimarron previously had not performed any specific characterization surveys on these unaffected areas, though these areas were included in the site-wide micro-R survey that was completed in 1979. The limited micro-R survey results were representative of background. The final status survey data for the unaffected areas are discussed in Section 5.2.3.

Also, slabs of concrete recently removed from the floor of the Uranium Building were surveyed for free release and then placed in the unaffected area of Subarea G. These concrete slabs were surveyed for both gross alpha and beta, and shown to meet the free release criteria. Additionally, these concrete slabs have been surveyed by the NRC to verify that they meet the release criteria for unrestricted use. By letter dated December 4, 1998⁴¹, the NRC confirmed that they did meet the release criteria and could be broken into rubble and placed in unaffected areas for erosion control. These slabs are still being stored in Subarea G and have not been broken into sections for placement into drainage ditches. Cimarron intends to use the concrete for erosion control sometime in the future.

3.4 Environmental Monitoring Data

As approved by the NRC in the Cimarron Decommissioning Plan⁷, Cimarron Corporation committed to address groundwater for the site in separate reports. One such report titled "Decommissioning Plan - Groundwater Evaluation Report", was submitted to the NRC in July 1998⁴². This Groundwater Evaluation Report summarizes the site environmental data, presents trending analyses and a dose assessment, and commits to a plan for resolving the issues associated with elevated residual groundwater radionuclide



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

November 24, 2000

42A

Mr. Jess Larsen, Vice President
Cimarron Corporation
P.O. Box 25861
Oklahoma City, OK 73125

SUBJECT: NUCLEAR REGULATORY COMMISSION REVIEW OF SUBAREA G
FINAL STATUS SURVEY REPORT FOR THE CIMARRON SITE IN
CRESCENT, OKLAHOMA.

Dear Mr. Larsen:

The U.S. Nuclear Regulatory Commission (NRC) staff has reviewed your submittal dated October 26, 2000 in response to our October 13, 2000 comments on the Subarea G Final Status Survey Report (FSSR). We have no further questions regarding the FSSR for Subarea G. As we have noted in the past, our current plan is to conduct a confirmatory survey of Subarea G in June 2001 in conjunction with our confirmatory inspections of Subareas K, N and F.

If you have any questions regarding this letter, please contact Ken Kalman at (301) 415-6664.

Sincerely,

for

Larry W. Camper, Chief
Decommissioning Branch
Division of Waste Management
Office of Nuclear Material Safety
and Safeguards

Docket No. 70-925
License No. SNM-928
cc: Cimarron distribution list

Cimarron Corporation Distribution List

Letter dated _____

Docket No. 70-925
License No. SNM-928

Karen Morgan
Cimarron Corporation
PO Box 315
Crescent OK 73028

Mike Broderick
Radiation Management Section
Waste Management Division
Department of Environmental Quality
1000 NE Tenth
Oklahoma City, OK 73117-1212